

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
UNITED STATES OF AMERICA,

Cr. No. 11-340 (ERK)(SMG)

-against-

MOUSA KHOULI, et al.,

Defendants.

-----X

DECLARATION OF PETER A. CHAVKIN

PETER A. CHAVKIN, an attorney duly admitted to practice law in the State of New York and before this Court, hereby declares under penalty of perjury:

1. I am a member of the law firm Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C. We represent defendant Joseph A. Lewis, II, in the above-captioned matter. I submit this Declaration to identify the exhibits referenced in the accompanying Memorandum of Law. They are attached to this Declaration

2. Attached at Tab 1 is a copy of Special Agent Brenton Easter's Affidavit in Support of a Search Warrant for the Premises known and described as 8902 Sawdust Trail, Chesterfield, Virginia.

3. Attached at Tabs 2, 3, 4, 5, 6, 10, 11, 28, 34 and 35 are emails provided by the government in discovery.

4. Attached at Tab 7 are copies of signed Bills of Sale.

5. Attached at Tab 8 are copies of Windsor Antiquities Bills of Sale with corrected provenance statement.

6. Attached at Tab 9 is a copy of an IOU.
7. Attached at Tab 12 is *The Importance of Provenance Documentation in the Market for Ancient Art and Artifacts: The Future of the Market May Depend on Documenting the Past*, Jane Levine, 19 DePaul J. Art Tech. & Intell. Prop. L. 219, Spring 2009
8. Attached at Tab 13 is *Due Diligence for Acquiring Cultural Property in the New Millennium*, L. Pinkerton, IFAR Journal, Vol. 3, pp. 50-52.
9. Attached at Tab 14 is chapter two of *Art, Artifact, Architecture and Museum Law* by Jessica L. Darraby.
10. Attached at Tab 15 is a copy of CAFRA seizure notices.
11. Attached at Tab 16A and 16B are copies of several auction house catalogue entries.
12. Attached at Tab 17A and 17B are copies of certain Chartis insurance records provided by the government in discovery.
13. Attached at Tab 18 is a copy of Special Agent Brenton Easter's Affidavit in Support of Application for Search Warrants for Various Email Accounts.
14. Attached at Tab 19 is a BB&T Bank Foreign Wire Transfer request form.
15. Attached at Tab 20 is a copy of an *Al Ahram Weekly* article written by Zahi Hawass.
16. Attached at Tab 21 is *The Art Law Handbook*, R. Kaufman, 2000 ed. at Appendix 11-A, p. 944, ¶6.
17. Attached at Tab 22 are pages from the Windsor Antiquities website.
18. Attached at Tab 23 is a 2011 announcement from the Michael C. Carlos Museum.

19. Attached at Tab 24 are pages from *Deir el-Balah: Uncovering an Egyptian Outpost in Canaan from the Time of the Exodus* by Trude Dothan (2008).

20. Attached at Tab 25 are eBay reviews of Windsor Antiquities.

21. Attached at Tab 26 is the 2009 *Arte Primitivo* catalogue.

22. Attached at Tab 27 is a copy of Special Agent Brenton Easter's Affidavit in Support of Arrest Warrant of Mousa/Morris Khouli.

23. Attached at Tab 29 is a copy of Special Agent Brenton Easter's Affidavit in Support of Search Warrant for the premises known and described as electronic mail address windsorant@yahoo.com.

24. Attached at Tab 30 is a copy of Special Agent Brenton Easter's Affidavit in Support of an Application for a Search Warrant for the premises known and described as Windsor Antiques located at 1050 Second Avenue, Booth #16, New York, New York.

25. Attached at Tab 31 are pages from the *Gorny & Mosch* auction house December 2004 catalogue, the 2009 *Arte Primitivo* catalogue and emails relating to *Sloans and Kenyon* and the *Malter Galleries* provided by the government in discovery.

26. Attached at Tab 32 are pages from catalogue provenances.

27. Attached at Tab 33 is a copy of a Bill of Sale.

28. Attached at Tab 36 is an article by Steven Urice, *Between Rocks and Hard Places: Unprovenanced Antiquities and the National Stolen Property Act*, 40 New Mexico Law Review, at 123, 125 (2010).

Dated: New York, New York
January 24, 2012



Peter A. Chavkin
Attorney for Joseph A. Lewis, II